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6 Attorneys for Plaintiff
7 United States of America

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 \$102,561.00 IN U.S. CURRENCY,
14 Defendant.

Case No. **'19CV2096 BEN BGS**
COMPLAINT FOR
FORFEITURE

15
16 By way of complaint against the defendant \$102,561.00 IN U.S. CURRENCY
17 (" \$102,561 in currency"), plaintiff UNITED STATES OF AMERICA alleges:

18 1. This Court has jurisdiction over this action by virtue of the provisions of
19 Title 28, United States Code, Section 1355(a) and Title 21, United States Code,
20 Section 881(a)(6), because the defendant \$102,561 in currency constitutes money
21 furnished or intended to be furnished in exchange for a controlled substance, or proceeds
22 traceable to an exchange for controlled substances in violation of Chapter 13 of Title 21,
23 United States Code.

24 2. Venue is proper in this district pursuant to Title 28, United States Code,
25 Section 1395 because the defendant \$102,561 in currency was found in this district.

26 3. On June 26, 2019, in the Southern District of California, at the San Diego
27 International Airport ("SDIA"), members of the San Diego Integrated Controlled
28 substances Task Force ("NTF") Commercial Interdiction Unit were on duty, seeking to

1 intercept and seize controlled substances and proceeds from the sales of controlled
2 substances passing through the airport.

3 A. The Task Force officers (“TFO”) were trained and experienced, and
4 knew persons engaged in the commercial interstate distribution of controlled substances
5 frequently used SDIA and the aircraft that arrived and departed there to distribute
6 controlled substances throughout the United States.

7 B. The TFOs were trained and experienced, and knew persons engaged in
8 the commercial interstate distribution of controlled substances frequently used SDIA, and
9 the aircraft which arrived and departed there, to transport drug sales proceeds and funds to
10 be used to purchase drugs in and out of San Diego. Those proceeds and funds were usually
11 in the form of United States currency.

12 C. The TFOs were trained and experienced, and knew persons engaged in
13 the commercial interstate distribution of controlled substances frequently used couriers to
14 transport controlled substances, drug sales proceeds, and funds to be used to purchase drugs
15 in and out of San Diego. SDIA and the aircraft that arrived and departed there are relied
16 upon as a means of sending and receiving such couriers.

17 4. On or about June 26, 2019, NTF Task Force officers and Drug Enforcement
18 Administration (“DEA”) agents assigned to SDIA learned YOUNES YASSEIN
19 (“YASSEIN”) was traveling from Nashville, Tennessee to SDIA aboard Southwest
20 Airlines Flight 2592.

21 A. YASSEIN was traveling on a one-way ticket, purchased within a few
22 hours of the scheduled departure time.

23 B. YASSEIN used a false name and false date of birth when purchasing
24 his one-way ticket to San Diego, California.

25 C. YASSEIN thereby caused Southwest Airlines to issue YASSEIN a one-
26 way boarding pass to San Diego, California under a false identity.

27 D. YASSEIN also had a documented history of identifying himself to law
28 enforcement as “Lewis Adam.”

1 E. YASSEIN, a resident of San Diego, California, did not purchase a
2 round trip ticket for his travel to and from Nashville, Tennessee.

3 F. YASSEIN was traveling with no checked luggage.

4 G. The TFOs and DEA agents had specialized training and were
5 experienced in investigating illegal drug and drug currency couriers. They knew the
6 purchase of a cross-country, one-way airline flight ticket even a day or two before departure
7 is unusual, and can be indicative the traveler is an illegal drug or drug currency courier.

8 H. The TFOs and DEA agents knew the general traveling public purchases
9 round trip airline tickets weeks or even months in advance of the scheduled departure date.
10 Advance purchase of round trip airline tickets results in lower fares for the traveler.
11 Purchasing a one-way airline ticket even a week in advance of departure all but guarantees
12 one will pay the highest fare.

13 I. The TFOs and DEA agents had specialized training and were
14 experienced in investigating illegal drug and drug currency couriers. They knew illegal
15 drug and drug currency couriers often times do not know when drugs or currency will be
16 available for transport until the last minute. The nature of illegal drug trafficking, and its
17 uncertainties, often compel couriers and their employers to purchase airline tickets close to
18 the departure date.

19 J. The TFOs and DEA agents were trained and experienced, and knew the
20 use of false identities was a means used by criminals to avoid detection by law enforcement,
21 and a means of insulating themselves from their documented criminal history.

22 K. The TFOs and DEA agents were trained and experienced, and knew
23 that San Diego is a primary source region for controlled substances cultivated and
24 manufactured on the west coast of the United States, Latin America, and elsewhere.

25 L. The TFOs and DEA agents were trained and experienced, and knew
26 controlled substances cultivated and manufactured on the west coast, in Latin America,
27 and elsewhere were sent and distributed for resale from source regions, such as San Diego
28 and the Southern District of California, to all points north and east within the United States.

1 The Nashville, Tennessee region was a known destination market for controlled substances
2 sourced from San Diego and the Southern District of California.

3 5. Prior to YASSEIN'S arrival aboard Southwest Airlines flight 2592, TFOs at
4 the Nashville, Tennessee airport advised the TFOs at SDIA that YASSEIN was
5 encountered by Transportation Security Agency ("TSA") officers, and noted to be traveling
6 with a very large amount of U.S. currency.

7 A. A TSA supervisor alerted a Nashville Airport Department of Public
8 Safety officer YASSEIN was at the TSA screening checkpoint with a very large amount
9 of currency.

10 B. Officer Hardy-Moore responded to the TSA screening checkpoint.

11 C. The TSA supervisor told Officer Hardy-Moore the currency YASSEIN
12 was carrying was wrapped in rubber bands, and was mostly in the \$20.00 denomination.

13 D. YASSEIN was uncooperative, argumentative, and repeatedly told
14 Officer Hardy-Moore YASSEIN did not have to speak with him.

15 E. Soon, Detective Kessler arrived at the TSA screening checkpoint, and
16 attempted to speak with YASSEIN.

17 F. As Detective Kessler attempted to engage YASSEIN in conversation,
18 YASSEIN became more and more agitated.

19 G. YASSEIN was permitted to board Southwest Airlines flight 2592 to
20 San Diego.

21 H. After YASSEIN boarded the aircraft, Detective Kessler discovered
22 YASSEIN was traveling under a false name and false date of birth.

23 6. The SDIA Task Force officers reviewed official United States, state, and local
24 criminal history data bases, and learned YASSEIN had a history of involvement in
25 commercial distribution of controlled substances, and was involved in a recent seizure of
26 a large amount of U.S. currency.

27 7. On March 7, 2018, in the Southern District of California, United States Border
28 Patrol ("USBP") agents conducted an investigative stop of a 2005 Toyota 4Runner SUV

1 as the vehicle proceeded north on Interstate Highway 15, near Rainbow Road and Old
2 Highway 395.

3 A. YASSEIN was the driver of the vehicle.

4 B. YASSEIN identified himself to the USBP agents as "Lewis Adam."

5 C. Inside the Toyota 4Runner, the USBP agents discovered and seized four
6 (4) trash bags containing approximately 23.85 kilograms (52.47 pounds) of marijuana, a
7 Schedule I Controlled Substance.

8 8. On April 8, 2019, in the Southern District of California, San Diego Police
9 Department ("SDPD") officers conducted a traffic stop in the Gaslamp District of a
10 black Infinity sedan.

11 A. YASSEIN was the driver of the vehicle.

12 B. YASSEIN was accompanied by three (3) passengers.

13 C. Inside the Infinity sedan, the SDPD officers discovered and seized a
14 loaded handgun and approximately \$47,421.00 in U.S. currency.

15 9. On June 26, 2019, just before 9:05 p.m., in SDIA Terminal One, the TFOs,
16 DEA agents, and two (2) uniformed San Diego Harbor Police ("SDHP") officers prepared
17 for the arrival of Southwest Airlines Flight 2592 and passenger YASSEIN.

18 A. At approximately 9:05 p.m., shortly after Southwest Airlines
19 Flight 2592 landed, the TFOs and DEA agents, armed with a physical description of
20 YASSEIN, identified him as he exited the jet way from Gate 8.

21 B. The TFOs and agents noted as YASSEIN exited the aircraft, he held a
22 cellular phone in front of his body, and pointed out, in an attempt to video-record
23 anticipated law enforcement activity in the terminal.

24 C. YASSEIN was pulling a green hard side roller bag with a black nylon
25 duffel bag resting on top.

26 10. TFO Fernandez and TFO Walton approached YASSEIN, identified
27 themselves as law enforcement officers, and attempted to speak with him.

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1 A. YASSEIN continued to walk at a brisk pace, all the while using his
2 cellular phone to video-record the TFOs and his surroundings.

3 B. YASSEIN was agitated, argumentative, and loud.

4 C. The TFOs explained to YASSEIN he was free to be on his way, but his
5 luggage was being detained while the TFOs attempted to obtain a search warrant.

6 D. TFO Henderson took custody of the roller bag and nylon duffel, and
7 moved the luggage a few feet away from where YASSEIN was standing.

8 11. In YASSEIN'S presence, TFO Henderson, a trained and experienced
9 controlled substance detection dog handler, used his trained and certified controlled
10 substance detection dog, "Voodoo", to conduct an examination of YASSEIN'S roller bag
11 and nylon duffel.

12 A. TFO Henderson and Voodoo were trained and certified as a dog handler
13 and controlled substance detection dog team.

14 B. Voodoo was trained to display a behavior or "alert" when he
15 encountered the scents or odors of a variety of controlled substances.

16 C. TFO Henderson was trained and experienced in recognizing Voodoo's
17 trained behaviors or alerts.

18 D. When exposed to the roller bag and nylon duffel, Voodoo alerted to the
19 presence of the scent of one or more controlled substances emanating from the luggage.

20 E. TFO Henderson observed the alert, told the other TFOs of the alert, and
21 explained its significance.

22 12. The TFOs repeatedly told YASSEIN he was free to leave, but his luggage was
23 being detained while the TFOs attempted to obtain a search warrant for the luggage and
24 its contents.

25 A. YASSEIN became progressively more agitated, and walked toward
26 TFO Henderson, Voodoo, and his luggage.

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28 //

1 B. YASSEIN became more and more aggressive, and at one point placed
2 his left hand on TFO Henderson's chest and attempted to pull his luggage away from
3 TFO Henderson.

4 C. TFO Henderson, with one hand holding YASSEIN'S luggage and the
5 other holding onto the leash of Voodoo, required the assistance of the two (2) uniformed
6 SDHP officers to restrain the highly agitated and screaming YASSEIN.

7 D. YASSEIN was detained for battery on a law enforcement officer,
8 placed in handcuffs, and escorted to the nearby NTF office.

9 13. On June 27, 2019, in the Southern District of California, TFO Henderson, an
10 officer of the San Diego Police Department, obtained Search Warrant 61130, issued by a
11 Judge of the Superior Court of the State of California, County of San Diego, authorizing
12 TFO Henderson to examine the contents of YASSEIN'S green hard side roller bag and
13 black nylon duffel bag.

14 14. Acting under authority of the search warrant, TFO Henderson and
15 TFO Walton opened the roller bag and nylon duffel, and examined their
16 respective contents.

17 A. Inside the nylon duffel were items of dominion and control under the
18 names of YASSEIN and Lewis Adam.

19 B. Inside the roller bag were, among other things, items of dominion and
20 control under the name of YASSEIN, and a black nylon gear bag.

21 C. Inside the black nylon gear bag were multiple bundles of U.S. currency.

22 D. The bundles of U.S. currency were secured by rubber bands.

23 E. The bundles of U.S. currency were made up of approximately 4,788
24 bills, in a variety of demoninations.

25 F. The bundles of U.S. currency were combined, counted, and determined
26 to be \$102,561.00 in U.S. currency.

27 G. The \$102,561.00 in U.S. currency discovered in the black nylon gear
28 bag is the defendant \$102,561 in currency.

1 15. The TFOs and DEA agents had specialized training and were experienced in
2 investigating illegal controlled substance traffickers and drug currency couriers. They
3 knew illegal street drug sales were virtually always conducted as an exchange of drugs
4 for currency.

5 A. The most common denomination used in illegal street drug transactions
6 was the \$20.00 bill.

7 B. Approximately 80% of the defendant \$102,561 in currency was made
8 up of \$20.00 bills.

9 16. TFO Henderson, the trained and experienced controlled substance detection
10 dog handler, and his trained and certified controlled substance detection dog, "Voodoo",
11 conducted an examination of the defendant \$102,561 in currency.

12 A. When exposed to the defendant \$102,561 in currency, Voodoo alerted
13 to the presence of the scent of one or more controlled substances emanating from
14 the currency.

15 B. TFO Henderson observed the alert, and relayed it to the other TFOs in
16 his presence.

17 17. The defendant \$102,561 in currency was seized for forfeiture by the DEA as
18 currency constituting proceeds of the purchase(s) of controlled substances, and money
19 possessed with the intent to be furnished in exchange for controlled substances.

20 18. The defendant \$102,561 in currency constitutes money furnished or intended
21 to be furnished in exchange for a controlled substance, in violation of Chapter 13, Title 21,
22 United States Code.

23 19. Alternatively, the defendant \$102,561 in currency constitutes proceeds of, or
24 proceeds traceable to, an exchange for a controlled substance, in violation of Chapter 13,
25 Title 21, United States Code.

26 20. Alternatively, the defendant \$102,561 in currency was used or intended to be
27 used to facilitate an exchange for a controlled substance, in violation of Chapter 13,
28 Title 21, United States Code.

1 21. As a result of the foregoing, the defendant \$102,561 in currency is liable to
2 condemnation and to forfeiture to the United States for its use in accordance with Title 21,
3 United States Code, §881(a)(6).

4 22. The defendant \$102,561 in currency is presently deposited within the
5 jurisdiction of this Court.

6 WHEREFORE, the United States prays that due process issue to enforce the
7 forfeiture of the defendant \$102,561 in currency, and that due notice be given to all
8 interested parties to appear and show cause why said forfeiture should not be declared.

9 DATED: November 1, 2019

10 ROBERT S. BREWER, JR.
11 United States Attorney

12 s/ Bruce C. Smith
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14 BRUCE C. SMITH
15 Assistant U.S. Attorney
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

AUSA Bruce C. Smith, Phone: (619) 546-8266

USAO, 880 Front Street, Room 6293, San Diego, CA 92101-8893

DEFENDANTS

\$102,561.00 in U.S. Currency

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

'19CV2096 BEN BGS**II. BASIS OF JURISDICTION**

(Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

21 U.S.C. Section 881

Brief description of cause:
Narcotics trafficking**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

11/01/2019

s/ Bruce C. Smith

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

VERIFICATION

I, Scott Henderson, state and declare as follows:

1. I am an officer of the San Diego Police Department and a Task Force Officer, assigned to a San Diego Integrated Controlled substances Task Force, Team 8, and am one of the task force officers assigned to this investigation.

2. I have read the foregoing Complaint For Forfeiture and know its contents.

3. The facts set forth in the Complaint For Forfeiture are based upon my own knowledge or were facts furnished to me by other United States federal, state, or local law enforcement personnel, civilian witnesses, or other official Government sources.

Based on this information, I believe the allegations in the Complaint For Forfeiture to be true.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief.

Executed on October 29, 2019.


SCOTT HENDERSON, TFO
NTF TEAM 8